

# Exhibit 2

**KIRKLAND & ELLIS LLP**  
AND AFFILIATED PARTNERSHIPS

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March 25, 2024

**BY EMAIL**

Daniel Dorris  
Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, DC 20036

Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

We write regarding the Authenticom data that you provided on Saturday, March 23, 2024, two business days after CDK's expert was deposed. We never received notice of any subpoena or document requests sent to any third parties during the class discovery period, and we have a number of questions about the request for and production of the Authenticom data, including with respect to the timing of this production.

**Data Requested.** As stated above, we never received any notice that this data was requested. Please explain (i) who requested this data from Authenticom (vendors, dealers, etc.), (ii) when it was requested, (iii) what data was sought, and (iv) how the request was made. In particular, was the request made via subpoena, written document request, by email, or verbally? To the extent any requests were made in writing, please provide the requests as required by Rule 45 and prior practice in this case.

**Data Received.** We also have questions about what you received from Authenticom and when. Please let us know (i) when you initially received this data from Authenticom, (ii) who provided the data to you, and (iii) whether you received any other information from Authenticom that you did not produce, including prior versions of the data. Please produce any transmittal cover emails, letters, or other information that Authenticom, a third party, provided with the data.

**Data Requested From Other Third Parties.** Have you requested data from any other third parties? If so, which third parties and what is the status of the requests? Please provide any and all discovery requests that you have made to third parties since the close of merits discovery.

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Please provide responses to these questions and the related documentation by Wednesday, March 27<sup>th</sup>. We reserve all rights regarding this production and any analyses or arguments made based on the newly disclosed data.

Sincerely,

*/s/ Katherine R. Katz*

Katherine R. Katz

CC: MDL Counsel of Record